



02-6

High Rocks

educate empower inspire

In the matter of Request for Review by High Rocks Educational Corporation
of Decision of Universal Service Administrator

April 7, 2016

Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Accepted / Filed
APR 19 2016
Federal Communications Commission
Office of the Secretary

RE: CC Docket No. 02-6
Form 471 Application Number: 1038927
Funding Request Number: 2849747
BENS: High Rocks Educational Corporation 16082069,
The Hub 16082119,
Steele Studio 16082122
SPIN: 143001432
FCC Registration Number: 0024493694

High Rocks Educational Corporation, 16082069, submits this letter to appeal the Commitment Adjustment Decision indicated in the Notification of Commitment Adjustment Letter dated 10/30/15 to the FCC. Please contact Karline Jensen, High Rocks Business Manager, at the following address to discuss this appeal:

195 Thompson Rd.
Hillsboro, WV 24946
Phone: 304 653-4891
Fax: 304 653-4860
karline@highrocks.org

Following is the text from the Notification of Commitment Adjustment Letter (attached) that is the subject of this appeal:

"Our routine review of Schools and Libraries Program (Program) funding commitments has revealed certain applications where funds were committed in violation of Program rules. In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust your overall funding commitment. The purpose of this letter is to make the required adjustments to your funding commitment, and to

195 Thompson Rd.
Hillsboro, WV 24946

www.highrocks.org
info@highrocks.org



No. of Copies rec'd 041
List ABCDE

304-653-4891
304-653-4860(fax)

give you an opportunity to appeal this decision. USAC has determined the applicant is responsible for all or some of the violations. Therefore, the applicant is responsible to repay all or some of the funds disbursed in error (if any)."

And from the Funding Commitment Adjustment Report (attached) for Form 471 Application Number 1038927:

"After multiple requests for documentation and application review, it has been determined that this funding commitment must be rescinded in full. Services were installed or delivered to ineligible entities: High Rocks Educational Corporation BEN 16082069, The Hub BEN 16082119 and Steele Studio BEN 16082122. These entities are ineligible to receive E-rate discounts. FCC rules require that discounts are to be provided only to entities eligible to receive funding. Entities: High Rocks Educational Corporation, The Hub and Steele Studio are after school programs and summer camps. Services requested were Internet Access. Since funding was provided to an ineligible entity, the program rules have been violated. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant."

The Notification of Commitment Adjustment Letter states that funding was rescinded as a result of a routine review which called into question the eligibility of the billed entities High Rocks Educational Corporation, The Hub, and Steele Studio.

The purpose of this appeal is to verify the eligibility of these entities so that the funding may be reinstated.

High Rocks Educational Corporation, The Hub, and Steele Studio meet the definition of a secondary school found in (20 U.S.C. Section 7801 (38):

"The term "secondary school" means a nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education, as determined under State law, except that the term does not include any education beyond grade 12."

High Rocks Educational Corporation, The Hub, and Steele Studio work in partnership with the public school systems, **providing secondary education as a part time school** to students whose home school is a public school. These educational services assist the public school system in meeting the goals for student achievement outlined in WV state law.

Each entity provides secondary education according to an agreement with the Board of Education in their school district (copies of agreements attached).

In addition, the entities provide free meals to students as part of the West Virginia Department of Education Summer Food and Child and Adult Food Service Programs. Attached please find copies of Summer Food Service Program Claim Reimbursement Statements. These meals, served at High Rocks Educational Corporation facilities and The Hub, are a vital part of

ensuring students' success in their secondary education, as outlined in WV State Law (full article attached):

"(d) The Legislature intends for the state and county boards of education to enter into public-private partnerships to eventually provide free nutritious meals for all pre-kindergarten through twelfth grade school children in West Virginia."

"Expenditures may also be made for initiatives developed with the Department of Health and Human Resources and public-private partnerships to provide outreach and nutritional meals when students are not in school."

"(g) The Department of Education and county boards of education shall form or expand existing partnerships with the federal and state departments of agriculture, Department of Health and Human Resources, local master gardeners, county extension agents or other experts in the field of agriculture or gardening to develop community gardens, farm-to-school programs and other such programs that teach students how to grow and produce healthy food and provide healthy food to the students."

Also attached please find letters from the WV Office of Child Nutrition verifying the student enrollment and free and reduced numbers for each school within the School Districts these entities serve.

Thank you for your consideration in this matter. High Rocks Educational Corporation, The Hub, and Steele Studio are award-winning educators of students in a rural area that does not have access to the high speed internet that most Americans can now take for granted. E-rate funding would increase the capacity of these entities to educate rural young citizens and prepare them to be leaders in a 21st century world. We are ready to offer top-notch STEAM coursework to these promising young students, but cannot give our classrooms access to the internet without the high speeds available through E-rate funding. In addition, the remoteness and low population density of our locality makes it difficult for students to travel to our classrooms. High speed internet would allow them to participate in classes from multiple locations connecting our geographically isolated communities.

Without E-rate funding, High Rocks will only have access to 1 Mbps or less (~0.77). With the funding, speeds of 20-30 Mbps are possible. What is your speed at home in D.C.?

Sincerely,

Karline Jensen

Karline Jensen
Business Manager
304 653-4891
karline@highrocks.org



Universal Service Administrative Company

Schools and Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2015: July 1, 2015 - June 30, 2016

October 30, 2015

Renee Anderson
HIGH ROCKS EDUCATIONAL CORPORATION
195 THOMPSON RD
HILLBORO, WV 24946

| | |
|----------------------------------|-----------------------------|
| Re: Form 471 Application Number: | 1038927 |
| Funding Year: | 2015 |
| Applicant's Form Identifier: | High Rocks |
| Billed Entity Number: | 16082069 |
| FCC Registration Number: | |
| SPIN: | 143001432 |
| Service Provider Name: | Frontier West Virginia Inc. |
| Service Provider Contact Person: | Sarah Knorr |

Our routine review of Schools and Libraries Program (Program) funding commitments has revealed certain applications where funds were committed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust your overall funding commitment. The purpose of this letter is to make the required adjustments to your funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the applicant is responsible for all or some of the violations. Therefore, the applicant is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

TO APPEAL THIS DECISION:

If you wish to appeal the Commitment Adjustment Decision indicated in this letter to USAC, your appeal must be received or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Number(s) (FRNs) you are appealing. Your letter of appeal must include the
 - Billed Entity Name,
 - Form 471 Application Number,
 - Billed Entity Number, and
 - FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Notification of Commitment Adjustment Letter that is the subject of your appeal to allow USAC to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal including any correspondence and documentation.
4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidax Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the "Schools and Libraries" section of the USAC website.

FUNDING COMMITMENT ADJUSTMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Adjustment Report (Report) for the Form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from your application for which adjustments are necessary. See the "Guide to USAC Letter Reports" posted at <http://usac.org/sl/tools/reference/guide-usac-letter-reports.aspx> for more information on each of the fields in the Report. USAC is also sending this information to your service provider(s) for informational purposes. If USAC has determined the service provider is also responsible for any rule violation on the FRN(s), a separate letter will be sent to the service provider detailing the necessary service provider action.

Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or your service provider(s) submits to USAC are consistent with Program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds your Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the applicant is responsible for repaying.

Schools and Libraries Division
Universal Services Administrative Company

cc: Sarah Knorr
Frontier West Virginia Inc.

Funding Commitment Adjustment Report for
Form 471 Application Number: 1038927

| | |
|--|-----------------------------|
| Funding Request Number: | 2849747 |
| Services Ordered: | INTERNET ACCESS |
| SPIN: | 143001432 |
| Service Provider Name: | Frontier West Virginia Inc. |
| Contract Number: | 3 and 4 |
| Billing Account Number: | 3046534891 |
| Site Identifier: | 16082069 |
| Original Funding Commitment: | \$49,180.70 |
| Commitment Adjustment Amount: | \$49,180.70 |
| Adjusted Funding Commitment: | \$0.00 |
| Funds Disbursed to Date | \$0.00 |
| Funds to be Recovered from Applicant: | \$0.00 |
| Funding Commitment Adjustment Explanation: | |

After multiple requests for documentation and application review, it has been determined that this funding commitment must be rescinded in full. Services were installed or delivered to ineligible entities: High Rocks Educational Corporation BEN 16082069, The Hub Ben 16082119 and Steele Studio BEN 16082122. These entities are ineligible to receive E-rate discounts. FCC rules require that discounts are to be provided only to entities eligible to receive funding. Entities: High Rocks Educational Corporation, The Hub and Steele Studio are after school programs and summer camps. Services requested were Internet Access. Since funding was provided to an ineligible entity, the program rules have been violated. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.



High Rocks


educate.

High Rocks and Greenbrier County Schools have worked in partnership for 20 years, since 1996 when High Rocks was founded by public educators to provide enrichment education in partnership with the school system. The mission of High Rocks is to educate, empower, and inspire young people in West Virginia.

Greenbrier County Schools and High Rocks Educational Corporation have a public-private partnership. Greenbrier County Schools is the county school system, and High Rocks is an educational non-profit also serving students in the area.

While students spend the majority of their time in a public school setting, High Rocks is a non-profit partner that provides additional learning outside of the school day to these students. In addition to their opportunities at school, Greenbrier County students receive education and nutrition services in the summer and afterschool at the High Rocks facilities.

Greenbrier teachers, guidance counselors, and administrators recommend Greenbrier students for entry to our intensive academic summer school, High Rocks Academy for Girls, and High Rocks presents to each student body about summer opportunities. In the summer, High Rocks provides access for Greenbrier students to high-quality free courses for female students in grades 7-12. These rigorous courses are taught in a residential camp setting and based on a gifted program model. Students are provided with three free meals a day. Courses include:

- Mathematics
- Creative and academic writing
- Creative expressions
- Visual Art
- Outdoor Environmental Science
- Entrepreneurship
- Civics
- Local History and Culture
- Music Education
- STEM exploratories, including computer programming
- College Preparation
- Nutrition Education
- Health and Wellness
- Physical Education and Outdoor Leadership Skills
- Social Studies and History
- Online learning and summer retention



Not only does High Rocks offer a valuable educational resource in the community for students when school is not in session, High Rocks comes into public schools to help meet needs that schools identify. These services are offered to both male and female students. In the past these needs have included health education workshops, watershed and environmental service workshops, high-risk student mentoring, tutoring, leadership groups, college readiness, and general teacher support.

High Rocks works with Greenbrier County School students and community volunteers outside of the school day to provide free educational programs for males and females grades 3-12, in addition to all the school is able to offer including:

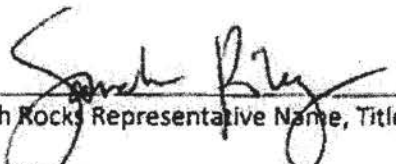
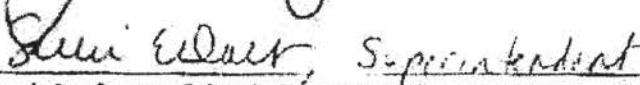
- Community-based classes, tutoring, mentoring for middle and high school students at The Hub in downtown Lewisburg
- Tutoring and enrichment programs for grades 3-5
- Four annual college trips to select colleges
- Hands-on civics field trips to the WV Legislature and Capitol Complex, including Lobby Days
- Bringing students annually to present at conferences including the Appalachian Studies Association
- Annual service-learning trips to another state
- Local Foods, Creative Writing, Geology, and Environmental Science field trips to students in our 200 acre campground classroom
- Annual Martin Luther King weekend learning workshop and presentation

Greenbrier County Schools provides bus transportation to High Rocks afterschool activities as needed and available, and has done so since before 2000. High Rocks afterschool programs would not be possible without the school system's support.

High Rocks provides key wrap-around academic services to children in need. 80% of participants qualify for free and reduced lunch. Nearly half will be first-generation college students. 100% of program participants graduate from high school, and 100% go on to college or another career development training opportunity. 100% of program alumnae college freshmen returned for their sophomore year in good standing.

All High Rocks activities are covered under the High Rocks Board of Risk Management Liability Insurance. All High Rocks staff and AmeriCorps members complete a background check. They are trained by school staff as are other school volunteers.

High Rocks raises all funds independently to provide these services and opportunities to students.

| | | |
|---|--------------------------------|--------|
|  | Sarah Riley, Director | 1/4/16 |
| High Rocks Representative Name, Title | Signed | Date |
|  | Susan E. Quast, Superintendent | 1/4/16 |
| Greenbrier County Schools Representative Name, Title | Signed | Date |



High Rocks


educate. empower. inspire.

Memo of Partnership

High Rocks and Pocahontas County Schools have worked in partnership for 20 years, since 1996 when High Rocks was founded by Pocahontas County public educators to provide enrichment education in partnership with the school system. The mission of High Rocks is to educate, empower, and inspire young people in West Virginia.

Pocahontas County Schools and High Rocks Educational Corporation have a public-private partnership. Pocahontas County Schools is the county school system, and High Rocks is an educational non-profit also serving students in the area.

While students spend the majority of their time in a public school setting, High Rocks is a non-profit partner that provides additional learning outside of the school day to these students. In addition to their opportunities at school, Pocahontas County students receive education and nutrition services in the summer and afterschool at the High Rocks facilities.

Pocahontas teachers, guidance counselors, and administrators recommend Pocahontas students for entry to our intensive academic summer school, High Rocks Academy for Girls and High Rocks presents to each student body about summer opportunities. In the summer, High Rocks provides access for Pocahontas students to high-quality free courses for female students in grades 7-12. These rigorous courses are taught in a residential camp setting and based on a gifted program model. Students are provided with three free meals a day. Courses include:

- Mathematics
- Creative and academic writing
- Creative expressions
- Visual Art
- Outdoor Environmental Science
- Entrepreneurship
- Civics
- Local History and Culture
- Music Education
- STEM exploratories, including computer programming
- College Preparation
- Nutrition Education
- Health and Wellness
- Physical Education and Outdoor Leadership Skills
- Social Studies and History
- Online learning and summer retention



Not only does High Rocks offer a valuable educational resource in the community for students when school is not in session, High Rocks comes into public schools to help meet needs that schools identify. These services are offered to both male and female students. In the past these needs have included health education workshops, watershed and environmental service workshops, high-risk student mentoring, tutoring, leadership groups, college readiness, and general teacher support.

High Rocks works with Pocahontas School students and community volunteers outside of the school day to provide free educational programs for males and females grades 3-12, in addition to all the school is able to offer including:

- Community-based tutoring and mentoring for middle and high school students
- Tutoring and enrichment programs for grades 3-5
- Four annual college trips to select colleges
- Hands-on civics field trips to the WV Legislature and Capitol Complex, including Lobby Days
- Bringing students annually to present at conferences including the Appalachian Studies Association
- Annual service-learning trips to another state
- Local Foods, Creative Writing, Geology, and Environmental Science field trips to students in our 200 acre campground classroom
- Annual Martin Luther King weekend learning workshop and presentation

Pocahontas County Schools provides bus transportation to High Rocks afterschool activities as needed and available, and has done so since 1996. High Rocks afterschool programs would not be possible without the school system's support.

High Rocks provides key wrap-around academic services to children in need. 80% of participants qualify for free and reduced lunch. Nearly half will be first-generation college students. 100% of program participants graduate from high school, and 100% go on to college or another career development training opportunity. 100% of program alumnae college freshmen returned for their sophomore year in good standing.

All High Rocks activities are covered under the High Rocks Board of Risk Management Liability Insurance.

All High Rocks staff and AmeriCorps members complete a background check. They are trained by school staff as are other school volunteers.

High Rocks raises all funds independently to provide these services and opportunities to students.

High Rocks Representative Name, Title

Signed

Date

Pocahontas County Schools Representative Name, Title Signed

Date

High Rocks and Nicholas County Schools have worked in partnership for 20 years, since 1996 when High Rocks was founded by public educators to provide enrichment education in partnership with the school system. The mission of High Rocks is to educate, empower, and inspire young people in West Virginia.

Nicholas County Schools and High Rocks Educational Corporation have a public-private partnership. Nicholas County Schools is the county school system, and High Rocks is an educational non-profit also serving students in the area.

While students spend the majority of their time in a public school setting, High Rocks is a non-profit partner that provides additional learning outside of the school day to these students. In addition to their opportunities at school, Nicholas County students receive education and nutrition services in the summer and afterschool at the High Rocks facilities.

Nicholas teachers, guidance counselors, and administrators recommend Nicholas students for entry to our intensive academic summer school, High Rocks Academy for Girls, and High Rocks presents to each student body about summer opportunities. In the summer, High Rocks provides access for Nicholas students to high-quality free courses for female students in grades 7-12. These rigorous courses are taught in a residential camp setting and based on a gifted program model. Students are provided with three free meals a day. Courses include:

- Mathematics
- Creative and academic writing
- Creative expressions
- Visual Art
- Outdoor Environmental Science
- Entrepreneurship
- Civics
- Local History and Culture
- Music Education
- STEM exploratories, including computer programming
- College Preparation
- Nutrition Education
- Health and Wellness
- Physical Education and Outdoor Leadership Skills
- Social Studies and History
- Online learning and summer retention

Not only does High Rocks offer a valuable educational resource in the community for students when school is not in session, High Rocks comes into public schools to help meet needs that schools identify. These services are offered to both male and female students. In the past these needs have included health education workshops, watershed and environmental service workshops, high-risk student mentoring, tutoring, leadership groups, college readiness, and general teacher support.

High Rocks works with Nicholas County School students and community volunteers outside of the school day to provide free educational programs for males and females grades 3-12, in addition to all the school is able to offer including:

- Community-based classes, tutoring, mentoring for middle and high school students at Steele Studio in downtown Richwood
- Tutoring and enrichment programs for grades 3-5
- Four annual college trips to select colleges
- Hands-on civics field trips to the WV Legislature and Capitol Complex, including Lobby Days
- Bringing students annually to present at conferences including the Appalachian Studies Association
- Annual service-learning trips to another state
- Local Foods, Creative Writing, Geology, and Environmental Science field trips to students in our 200 acre campground classroom
- Annual Martin Luther King weekend learning workshop and presentation

Nicholas County Schools provides bus transportation to High Rocks afterschool activities as needed and available, and has done so since before 2000. High Rocks afterschool programs would not be possible without the school system's support.

High Rocks provides key wrap-around academic services to children in need. 80% of participants qualify for free and reduced lunch. Nearly half will be first-generation college students. 100% of program participants graduate from high school, and 100% go on to college or another career development training opportunity. 100% of program alumnae college freshmen returned for their sophomore year in good standing.

All High Rocks activities are covered under the High Rocks Board of Risk Management Liability Insurance.

All High Rocks staff and AmeriCorps members complete a background check. They are trained by school staff as are other school volunteers.

High Rocks raises all funds independently to provide these services and opportunities to students.

High Rocks Representative Name, Title

Signed

Date

Pocahontas County Schools Name, Title

Signed

Date

"CHAPTER 18. EDUCATION.

ARTICLE 5D. West Virginia Feed to Achieve Act. §18-5D-1.

§18-5D-2. Legislative findings; intent.

(a) The Legislature finds and declares that:

(1) Every child in school needs to have nutritious meals in order to achieve his or her potential. Providing the best schools and teachers alone does not ensure a child is mentally present and able to learn. A growing body of research establishes that a hungry child is less able to process the information provided and is less likely to be attentive to the lessons being taught.

(2) President Harry S. Truman began the national school lunch program in 1946 as a measure of national security to safeguard the health and well-being of the nation's children and to encourage the domestic consumption of nutritious agricultural commodities and other food. Last year in West Virginia, 32.3 million school lunches were served to students in public schools.

(3) Research shows that healthy eating, proper nutrition and regular physical activity result in students who have: (A) Increased standardized achievement test scores; (B) improved attendance; (C) reduced tardiness; (D) improved academic, behavioral and emotional functioning; and (E) improved nutrition, and for many students, the nutritious breakfast at school is essential.

(4) Schools that provide universal breakfast programs also report: (A) Decreases in discipline and psychological problems; (B) decreases in visits to school nurses; (C) decreases in tardiness; (D) increases in student attentiveness; (E) increases in attendance; and (F) improved learning environments, and these positive attributes are furthered through comprehensive healthy schools policies that include quality nutrition, integrating physical activity during the school day, and teaching children about the importance of embracing a healthy active lifestyle.

(5) An effective school breakfast program is not an interruption of the school day; it is an integral and vital part of the school day.

(6) The participation rate for the school breakfast program varies greatly among our counties. Those counties which have made a determined effort to increase participation by offering programs to best meet student needs, such as Grab-And-Go Breakfasts, providing Breakfast in the Classroom or providing Breakfast After First Period, are feeding significantly higher percentages of their students.

(7) The West Virginia Center on Budget and Policy reports that in 2011 more than 25 percent of the children in West Virginia lived in homes with a household income below the federal poverty line, which is \$23,050 for a family of four. About 50 percent of West Virginia children live in homes with a household income below twice the federal poverty level, \$46,100 for a family of four, which is approximately the level of the Work Force West Virginia self-sufficiency standard.

(8) The majority of students from families below the self-sufficiency standard are currently not eating breakfast at school. On the average school day during the 2011-2012 school year, less than half of the West Virginia students

eligible for a federally funded free breakfast actually received one. On that same average day, only about one third of the students eligible to receive a reduced price breakfast actually received one.

(9) In order to maximize each child's potential to learn and develop, the Legislature, schools and communities must partner to provide the most basic support for learning: nutritious meals.

(10) In order to maximize student participation in school nutrition programs and to reduce the secondary adverse impacts of poverty, it is important that schools provide nutritious meals without a risk to students of being stigmatized as poor.

(11) High rates of childhood hunger and childhood obesity occur simultaneously because children are not receiving healthy, nutritious food. According to the Data Resource Center for Child and Adolescent Health and others, in 2008 West Virginia ranked 44 in overall prevalence of childhood obesity, with 35.5 percent of children considered either overweight or obese.

(12) According to the 2008 Pediatric Nutrition Surveillance System, which assesses weight status of children from low-income families participating in the Women, Infants and Children program, 28.3 percent of low income children age 2-5 are overweight or obese in West Virginia.

(13) The Food Research and Action Center has found that providing a balanced school breakfast may protect against childhood obesity. School breakfast participation, particularly when combined with comprehensive efforts that include regular physical activity and promote healthy eating habits, is associated with a lower body mass index, a lower probability of being overweight and a lower probability of obesity, all of which help prevent a range of chronic diseases including Type II Diabetes, high blood cholesterol, high blood pressure, heart disease and stroke.

(14) Participation in federally funded meals in child care, preschool, school, or summer settings is associated with a lower body mass index among young, low income children.

(15) Private and nonprofit sectors have shown a willingness to commit significant resources to addressing hunger in America, leveraging federal programs and enlisting their employees, customers and clients to improve the availability and accessibility of affordable, healthy food for those in need of assistance.

(16) Public schools in this state and others are adopting a continuum of policies to implement low cost, effective programs that include physical activity, physical education, proper nutrition and the promotion of healthy eating habits, along with involvement by school staff, families and communities, and a variety of resources to assist schools in adopting and implementing these programs are easily accessible on the internet and through the Office of Healthy Schools in the West Virginia Department of Education.

(b) In order to maximize the economies of scale and to access all available federal funds to support our school nutrition programs, the Feed to Achieve initiative directs schools to make available and to promote the federally approved and subsidized meals to all pre-kindergarten through twelfth grade students, to make them readily available and to consider reducing or eliminating the cost to students if sufficient funds become available.

(c) The Legislature intends to provide a framework for the State Board of Education and the county boards of education to provide, as effectively and as efficiently as possible, a minimum of two nutritious meals each school day to all students.

(d) The Legislature intends for the state and county boards of education to enter into public-private partnerships to eventually provide free nutritious meals for all pre-kindergarten through twelfth grade school children in West Virginia.

(e) The Legislature encourages county boards to examine the options available for comprehensive policies and programs to improve student health and promote academic achievement and to establish a comprehensive policy on healthy schools that best meets the needs of their student population.

(f) It is not the intention of the Legislature to allow or encourage parents to abdicate their parental responsibility related to providing healthy, nutritious meals for their children. However, it is the intent of the Legislature that no child be denied nutritious meals.

(g) It is the intent of the Legislature that healthy nutritious school lunches be made available to all students in a manner which maximizes participation and minimizes stigma attached to participating low income students. **§18-5D-**

3. School nutrition programs.

(a) Each county board of education shall establish and operate school nutrition programs under which, at a minimum, a nutritious breakfast and lunch are made effectively available to all students enrolled in the schools of the county in accordance with the State Board of Education standards. The standards shall include guidelines for determining the eligibility of students for paid, free and reduced meals. The standards shall also establish procedures and guidelines for the Feed to Achieve initiative to allow for the provision of healthy, nutritious meals to all elementary school students, without cost to students, where schools find it practical to do so.

(b) The Feed to Achieve initiative will be phased in for all elementary schools as sufficient funds become available, through donations, contributions and payments made by individuals, communities, businesses, organizations and parents or guardians on behalf of students. Nothing in this article prohibits any school from providing free meals to all of its students.

(c) Each county board of education shall:

(1) Require all schools to adopt a delivery system approved by the state Office of Child Nutrition, no later than the 2015 school year, that ensures all students are given an adequate opportunity to eat breakfast. These approved systems shall include, but are not limited to, Grab-And-Go Breakfasts, Breakfast in the Classroom or Breakfast After First Period; and

(2) Collaborate with the state Office of Child Nutrition to develop strategies and methods to increase the percentage of children participating in the school breakfast and lunch nutrition programs.

(d) In addition to other statistics, the county boards of education, in consultation with the state Office of Child Nutrition, shall determine the number of children in each school who are participating in each meal offered by the school; the number of children who are not eating each meal offered by the school; and the total daily attendance.

(e) The state Office of Child Nutrition shall report to the Joint Committee on Government and Finance, the Select Committee on Children and Poverty and the Legislative Oversight Commission on Education Accountability on or before December 31, 2015, and each year thereafter, on the impacts of the Feed to Achieve Act and any recommendations for legislation.

(f) County boards of education may utilize the nonprofit funds or foundations established in section four of this article or other available funds to offset the costs of providing free meals, after school and summer nutrition programs to elementary students.

(g) If at any time federal financial appropriations to this state for school nutrition programs are terminated, county boards of education are hereby authorized, but not required, to continue the programs at their own expense.

(h) Classroom teachers may not be required to participate in the operation of the school breakfast program as part of their regular duties. **§18-5D-4. Creating public-private partnerships; creating nonprofit foundation or fund; audit.**

(a) The Department of Education and each county board of education shall promptly establish a fund that is restricted solely for the receipt and expenditure of gifts, grants and bequests for the purposes of this article and may establish in lieu thereof a nonprofit foundation for this purpose. The purpose of the fund or nonprofit foundation is to provide supplemental or matching funds to increase participation in the nutrition programs in the Feed to Achieve initiative set forth in subsection (c) of this section. The Department of Education shall utilize its fund or nonprofit foundation to assist county boards of education in counties whose fund or foundation lacks sufficient business, industry and individual contributors to fund the Feed to Achieve nutrition programs.

(b) Financial support for the fund or foundation may come from either public or private gifts, grants, contributions, bequests and endowments.

(c) Expenditures from the state or county funds or by the foundations shall be used for provision of food to students through any of the programs or initiatives approved by the Office of Child Nutrition, including the following programs: School Breakfast Program, National School Lunch Program, the Summer Food Service Program, the Fresh Fruit and Vegetable Program, the Child and Adult Care Food Program, the farm-to-school initiative and community gardens. Expenditures may also be made for initiatives developed with the Department of Health and Human Resources and public-private partnerships to provide outreach and nutritional meals when students are not in school.

(d) No administrative expenses or personnel expenses for any of the state departments implementing this act, the State Board of Education, any county board of education, school or program may be paid from the funds or by the foundations.

(e) Individuals or businesses that contribute to the funds or foundations may specify schools or nutrition programs for which the contribution is to be used.

(f) The Department of Education and county boards of education may establish public-private partnerships to enhance current or advance additional nutrition programs that provide nutritious food for children to take home for weekend meals.

(g) The Department of Education and county boards of education shall form or expand existing partnerships with the federal and state departments of agriculture, Department of Health and Human Resources, local master gardeners, county extension agents or other experts in the field of agriculture or gardening to develop community gardens, farm-to-school programs and other such programs that teach students how to grow and produce healthy food and provide healthy food to the students.

(h) The Department of Education shall collaborate with the Department of Health and Human Resources to develop effective strategies and programs such as after school nutrition outreach and programs that improve the healthy lifestyle of all students in pre- kindergarten through twelfth grade. The Department of Health and Human Resources may propose rules for promulgation in accordance with the provisions of article three, chapter twenty-nine-a of this code to effectuate any programs so developed.

(i) All moneys contributed to a fund or foundation established pursuant to this section and all expenditures made therefrom shall be audited as part of the annual independent audit of the State Board of Education and the county boards of education."

December 14, 2015

Ms. Karlene Jensen, Business Manager
 High Rocks Educational Corporation
 195 Thompson Road
 Hillsboro, WV 24946

Re: Request for Enrollment and Percent Needy Data

Dear Ms. Jensen,

I am writing to provide you with your request for information regarding the enrollment and percent needy data for all schools in Greenbrier, Nicholas and Pocahontas counties. Please refer to the charts below for information requested for the current school year (2015-2016):

Greenbrier County – Enrollment per School

| School | Grades Served | Count |
|----------------------------------|---------------|-------|
| Crichton Elementary | PK - 05 | 96 |
| Rainelle Elementary | PK - 05 | 225 |
| Rupert Elementary | PK - 05 | 210 |
| Smoot Elementary | PK - 05 | 150 |
| Alderson Elementary | PK - 05 | 208 |
| Frankford Elementary | PK - 05 | 235 |
| Lewisburg Elementary | PK - 05 | 525 |
| Ronceverte Elementary | PK - 05 | 424 |
| White Sulphur Elementary | PK - 05 | 357 |
| Eastern Greenbrier Middle School | 06 - 08 | 801 |
| Western Greenbrier Middle School | 06 - 08 | 300 |
| Greenbrier East High School | PK - 12 | 1,185 |
| Greenbrier West High School | 09 - 12 | 392 |

Greenbrier County – Percent Needy

| SCHOOL | PERCENT NEEDY |
|-----------------------|---------------|
| Alderson Elementary | 68.78% |
| Crichton Elementary | 92.48% |
| Eastern Greenbrier M | 49.37% |
| Frankford | 55.17% |
| Greenbrier East High | 46.20% |
| Greenbrier West High | 56.10% |
| Lewisburg Elementary | 46.17% |
| Rainelle Elementary | 90.53% |
| Ronceverte Elementary | 63.86% |
| Rupert Elementary | 90.64% |
| Smoot Elementary | 84.09% |
| Western Greenbrier M | 66.22% |

Nicholas County – Enrollment per School

| School | Grades Served | Count |
|---------------------------------|---------------|-------|
| Birch River Elementary School | PK - 05 | 106 |
| Cherry River Elementary School | PK - 05 | 211 |
| Dixie Elementary School | PK - 05 | 41 |
| Glade Creek Elementary School | PK - 05 | 163 |
| Gauley River Elementary School | PK - 05 | 380 |
| Mt Lookout Elementary School | PK - 05 | 140 |
| Mt Nebo Elementary School | PK - 05 | 118 |
| Summersville Elementary School | PK - 05 | 441 |
| Zela Elementary School | PK - 05 | 77 |
| Panther Creek Elementary School | PK - 05 | 293 |
| Richwood Middle School | 06 - 08 | 274 |
| Summersville Middle School | 06 - 08 | 523 |
| Nicholas County High School | 09 - 12 | 720 |
| Richwood High School | 09 - 12 | 383 |

Nicholas County – Percent Needy

| SCHOOL | PERCENT NEEDY |
|-----------------------------|---------------|
| White Sulphur Elementary | 60.00% |
| Birch River Elementa | 93.66% |
| Cherry River Element | 98.51% |
| Dixie Elementary | 78.95% |
| Gauley River Elementary | 73.43% |
| Glade Creek Elementary | 53.55% |
| Mt. Lookout Elementary | 62.73% |
| Mt. Nebo Elementary | 60.00% |
| Nicholas County High School | 51.73% |
| Panther Creek Elementary | 56.45% |
| Richwood High School | 65.16% |
| Richwood Middle School | 71.63% |
| Summersville Middle School | 57.76% |
| Summersville Element | 59.52% |
| Zela Elementary | 99.20% |

Pocahontas – Enrollment per School

| School | Grades Served | Count |
|-------------------------------------|---------------|-------|
| Hillsboro Elementary School | PK - 05 | 81 |
| Green Bank Elementary-Middle School | PK - 08 | 268 |
| Marlinton Elementary School | PK - 04 | 247 |
| Marlinton Middle School | 05 - 08 | 161 |
| Pocahontas County High School | 09 - 12 | 310 |

Pocahontas – Percent Needy

| SCHOOL | PERCENT NEEDY |
|-------------------------------------|---------------|
| Green Bank Elementary-Middle School | 66.10% |
| Hillsboro School | 72.62% |
| Marlinton Elementary | 76.52% |
| Marlinton Middle | 62.84% |
| Pocahontas County High School | 61.30% |

The information in the charts above are public and made available on the West Virginia Department of Education's website. Should you have further questions, please feel free to contact Cybele Boehm at cboehm@k12.wv.us or at 304-558-2709.

Sincerely,



Richard J. Goff, Executive Director
Office of Child Nutrition

RG/CB/tp

pc: Cybele Boehm

Applicant: HIGH ROCKS EDUCATIONAL CORPORATION
Billed Entity Number: 16082069
Date Submitted: Apr 15, 2015

Application Number: 1038927
Nickname: High Rocks
Date Certified: Apr 15, 2015

Original Form Data ✓

Current Form Data

Basic Information

Expand All Collapse All Scroll to T

Billed Entity

Name of Billed Entity: HIGH ROCKS EDUCATIONAL CORPORATION
Billed Entity Number: 16082069
FCC Registration Number: 0024493694
Address 1: 195 THOMPSON RD
City: HILLBORO **State:** WV **Zip Code:** 24946
Telephone Number: (304) 653-4891 **Ext:** None Provided
Fax Number: (304) 653-4860

Contact Information

Contact Person's Name: Renae Anderson
Contact Person's Email Address: renae@highrocks.org
Is the contact person's address the same as that of the Billed Entity? Yes
Correspondence Address: BEN address
Name of person to receive correspondence: Renae Anderson
Holiday / Summer Contact Information:

Application Type and Recipients of Service

Type of Application: School
Recipients of Services: Private

Submitter's Email Address: renae@highrocks.org

Discount Calculation

Expand All Collapse All Scroll to T

Funding Request Category: Category 1

HIGH ROCKS EDUCATIONAL CORPORATION - 16082069

Entities

| Billed Entity Number | Entity Name | NCES Code | Urban or Rural | NIF | State LEA ID | State School ID | Student Count Based on Est. ? | Alt. Disc. | Attributes |
|----------------------|------------------------------------|-----------|----------------|-----|--------------|-----------------|-------------------------------|------------|------------|
| 16082119 | THE HUB | | R | No | | | No | | |
| 16082122 | STEELE STUDIO | | R | No | | | No | | |
| 16082069 | HIGH ROCKS EDUCATIONAL CORPORATION | | R | No | | | No | | |

Entities

Optional Worksheet

| Entity # | Entity Name | Urban Rural | Number of Students Attending This School as Their Home School | If Using CEP, Percentage of Direct Certification Students | Total Number of Students in School Eligible for NSLP |
|----------|------------------------------------|-------------|---|---|--|
| 16082119 | THE HUB | R | 200 | | 144 |
| 16082122 | STEELE STUDIO | R | 50 | | 36 |
| 16082069 | HIGH ROCKS EDUCATIONAL CORPORATION | R | 200 | | 144 |

Optional Worksheet

Discount Rate Calculation

| Overall Urban/Rural Status | Total Number of Students Enrolled in District | Total Number of Students in District Eligible for NSLP | Percentage of Students in District Eligible for NSLP | Category 1 Discount Rate |
|----------------------------|---|--|--|--------------------------|
| R | 450 | 324 | 72% | 80% |

HIGH ROCKS EDUCATIONAL CORPORATION - 16082069

Connectivity Questions

Does the school district (or school, if not part of a district) have Internet access of

- ☒ less than 100 Mbps per 1,000 users (students and staff)
- ☐ at least 100 Mbps per 1,000 users but less than 1Gbps per 1,000 users
- ☐ at least 1 Gbps per 1,000 users

How many of the schools in the school district have Wide Area Networking connections that are scalable to 10 Gbps? 0

How many schools in your school district have LAN/WLAN capacity and coverage

- completely sufficient to support the educational or library activities conducted here? 0
- mostly sufficient to support the educational or library activities conducted here? 0
- sometimes sufficient to support the educational or library activities conducted here? 0
- rarely sufficient to support the educational or library activities conducted here? 2
- not sufficient to support the educational or library activities conducted here? 1

For those schools and libraries that do not have sufficient LAN/WLAN capacity and coverage to support the educational objectives or library activities conducted at that location, is the reason (check all that apply):

- ☒ Equipment too costly
- ☒ Installation too costly
- ☒ Broadband connection speed to building is too slow
- ☒ Inadequate local area network (LAN) services/internal networks and wiring
- ☒ Outdated equipment
- ☒ Lack of training and technical support
- ☐ Inconsistent service/frequent outages and down time
- ☐ Physical structure or layout of building(s)
- ☐ Other: If so, please provide it here

Funding Requests

Expand All Collapse All Scroll to T

High Rocks Telecom - 2849645

Key Information

Duplicate Funding Request Number:

Service Type: TELCOMM SERVICES

Form470 Number: 280170001323610

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143001432

SPIN Name: Frontier West Virginia Inc.

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a

Billing Account Number: 3046534891

Purchase Type: CONTRACT

Contract Number: 1 and 2

What is the date you awarded your contract? 07/01/2015

What is the date your contract expires? 06/30/2020

When will the services start? 07/01/2015

previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

High Rocks is requesting increase phone lines in three locations; up to 7 phone lines at High Rocks Educational Corporation in Hillsboro up to 3 lines at the HUB in Lewisburg and up to 2 lines in Richwood WV. These phone lines will include caller id, incoming call line roll-over, unlimited local calling and 10,000 minutes of long distance nation-wide calling.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

| FRN Line Item Number | Service Type | Product Type | Purpose | Lines | Upload Speed | Burst Bandwidth? | Last Mile? | Firewall? | Monthly Cost Eligible | One Time Cost Eligible | Extended Cost |
|----------------------|---------------|--|-----------|-------|----------------|------------------|------------|-----------|-----------------------|------------------------|---------------|
| 1 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 2 | 0Mbps 0Mbps | No | No | No No | \$40.66 \$0.00 | \$0.00 \$0.00 | \$487.92 |

| Entity # | Entity Name |
|----------|---------------|
| 16082122 | STEELE STUDIO |

| | | | | | | | | | | | |
|---|---------------|--|-----------|----|----------------|----|----|----------|--------------------|------------------|------------|
| 2 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 15 | 0Mbps 0Mbps | No | No | No No | \$394.95 \$0.00 | \$0.00 \$0.00 | \$4,739.40 |
|---|---------------|--|-----------|----|----------------|----|----|----------|--------------------|------------------|------------|

| Entity # | Entity Name |
|----------|------------------------------------|
| 16082069 | HIGH ROCKS EDUCATIONAL CORPORATION |
| 16082119 | THE HUB |

| | | | | | | | | | | | |
|---|---------------|--|-----------|----|----------------|----|----|----------|-------------------|------------------|----------|
| 3 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 16 | 0Mbps 0Mbps | No | No | No No | \$32.00 \$0.00 | \$0.00 \$0.00 | \$384.00 |
|---|---------------|--|-----------|----|----------------|----|----|----------|-------------------|------------------|----------|

| Entity # | Entity Name |
|----------|------------------------------------|
| 16082069 | HIGH ROCKS EDUCATIONAL CORPORATION |
| 16082119 | THE HUB |
| 16082122 | STEELE STUDIO |

| | | | | | | | | | | | |
|---|---------------|--|-----------|----|----------------|----|----|----------|-------------------|------------------|----------|
| 4 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 13 | 0Mbps 0Mbps | No | No | No No | \$18.20 \$0.00 | \$0.00 \$0.00 | \$218.40 |
|---|---------------|--|-----------|----|----------------|----|----|----------|-------------------|------------------|----------|

| Entity # | Entity Name |
|----------|------------------------------------|
| 16082069 | HIGH ROCKS EDUCATIONAL CORPORATION |

16082119 THE HUB

| | | | | | | | | | | | |
|---|---------------|--|-----------|---|-------|----|----|----|--------|--------|---------|
| 5 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 5 | 0Mbps | No | No | No | \$4.80 | \$0.00 | \$57.60 |
| | | | | | 0Mbps | | | No | \$0.00 | \$0.00 | |

Entity # Entity Name

16082069 HIGH ROCKS EDUCATIONAL CORPORATION

16082119 THE HUB

16082122 STEELE STUDIO

| | | | | | | | | | | | |
|---|---------------|--|-----------|---|-------|----|----|----|---------|--------|----------|
| 6 | Miscellaneous | Installation, Activation and Initial Configuration | Transport | 7 | 0Mbps | No | No | No | \$60.00 | \$0.00 | \$720.00 |
| | | | | | 0Mbps | | | No | \$0.00 | \$0.00 | |

Entity # Entity Name

16082069 HIGH ROCKS EDUCATIONAL CORPORATION

16082119 THE HUB

16082122 STEELE STUDIO

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$5,285.86

Monthly Charges

| | |
|---------------------------------------|--------------------|
| Total Charges: | \$550.61 (monthly) |
| Ineligible charges: | - \$0.00 (monthly) |
| Eligible monthly pre-discount amount: | \$550.61 |
| Total number of months of service: | x 12 |
| Total annual recurring charges: | \$6,607.32 |

Total One-time Charges

| | |
|--------------------------------------|----------|
| Total Charges: | \$0.00 |
| Ineligible charges: | - \$0.00 |
| Eligible annual pre-discount amount: | \$0.00 |

Total Requested Amount

| | |
|-----------------------------|------------|
| Total eligible charges: | \$6,607.32 |
| Discount Rate: | x 80% |
| Funding Commitment Request: | \$5,285.86 |

High Rocks Telecom - 2849645

High Rocks Internet - 2849747

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 280170001323610

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143001432

SPIN Name: Frontier West Virginia Inc.

Billing Account Number: 3046534891

Purchase Type: CONTRACT

Contract Number: 3 and 4

What is the date you awarded your contract? 07/01/2015

What is the date your contract expires? 06/30/2020

When will the services start? 07/01/2015

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? No

Previous FRN Number:

Narrative:

High Rocks is requesting the creation of WAN connecting all three locations. We are also requesting increased internet speeds because the educators and students at High Rocks are currently unable to work, learn or teach efficiently or collaboratively with the poor internet that is provided now (.5 Mbps). We request up too 100 MB access with EVC port and 60MB internet at High Rocks Educational Corporation in Hillsboro, up to 30 MB access at the Hub in Lewisburg and up to 20 MB access at Steele Studio in Richwood, WV.

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$49,180.7

Monthly Charges

Total Charges: \$5,122.99 (monthly)

Ineligible charges: - \$0.00 (monthly)

Eligible monthly pre-discount amount: \$5,122.99

Total number of months of service: x 12

Total annual recurring charges: \$61,475.88

Total One-time Charges

Total Charges: \$0.00

Ineligible charges: - \$0.00

Eligible annual pre-discount amount: \$0.00

Total Requested Amount

| | |
|-----------------------------|-------------|
| Total eligible charges: | \$61,475.88 |
| Discount Rate: | x 80% |
| Funding Commitment Request: | \$49,180.70 |

High Rocks Internet - 2849747

⊖ Certifications & Signatures

⊕ Expand All

⊖ Collapse All

⬆ Scroll to T

I certify that the entities listed in Block 4 of this application are eligible for support because they are:

✓ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

✓ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the service purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the gc and services to the service provider(s).

| | | |
|---|--|------------|
| A | Total funding year pre-discount amount on this FCC Form 471 | \$68,083.1 |
| B | Total funding commitment request amount on this FCC Form 471 | \$54,466.1 |
| C | Total applicant non-discount share | \$13,616.1 |
| D | Total budgeted amount allocated to resources not eligible for E-rate support | \$0.1 |
| E | Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resource necessary to make effective use of the discounts | \$13,616.1 |

✓ Check this box if you are receiving any of the funds in Item E directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Item E.

✓ I certify that an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology g

✓ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

✓ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider any representative or agent thereof or any consultant in connection with this request for services.

✓ I certify that I and the entity(ies) I represent have complied with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

✓ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantage

schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

✓ I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

✓ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request and that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

✓ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

✓ I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(2).

✓ I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on this FCC Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

Authorized Person

Name of authorized person: Sarah Riley

Title or position of authorized person: Executive Director

Street address, P.O. Box or Route Number of authorized person

(1): 195 Thompson Road

Street address, P.O. Box or Route Number of authorized person

(2):

City of authorized person: Hillsboro

State: WA

Zip code of authorized person: 24946

Telephone number: (304) 653-4891

Ext.: 151

Fax number of authorized person: (304) 486-4860

Email address of authorized person: sarah@highrocks.org

Name of authorized person's employer: High Rocks Educational Corporation

Back

60001568801.txt

From: Karline Jensen
Sent: Thursday, April 07, 2016 5:39 PM
To: 'appeals@sl.universalservice.org'
Cc: Sarah; David.Giordano@ftr.com; McIntosh, Denise (denise.mcintosh@ftr.com); tc2nova@gmail.com
Subject: Appeal of Commitment Adjustments: 2849747 and 2849645
Attachments: appeal2849645.pdf; appeal2849747.pdf; Funding Commitment Adjustment for Funding Request Number 2849645.pdf; Funding Commitment Adjustment for Funding Request Number 2849747.pdf; 1 Greenbrier County partnership letter.pdf; 2 Pocahontas County Schools partnership agreement.pdf; 3 Nicholas County Schools partnership agreement.pdf; 4 WV Feed to Achieve Act.pdf; 5 School Enrollment and Percent Needy.pdf; FCC Form 471 Application - Funding Year 2015.pdf; 6 Summer Food Service Program Claims.pdf

To the Schools and Libraries Division of the USAC:

This notice serves to inform you that High Rocks Educational Corporation has filed an appeal of Commitment Adjustments 2849747 and 2849645 with the FCC.

Sincerely,

Karline Jensen
Business Manager

High Rocks Educational Corp.
195 Thompson Road
Hillsboro, WV 24946
304-653-4891
www.highrocks.org